



NATIONAL POTATO COUNCIL

1300 L Street, NW, Suite 910
Washington, DC 20005
202.682.9456 phone · 202.682.0333 fax
www.nationalpotatocouncil.org

July 29, 2011

Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

Attention: IB Docket No. 11-109

Submitted electronically via <http://fjallfoss.fcc.gov>

On behalf of the National Potato Council (NPC) and US potato growers, thank you for accepting these comments related to the potential interference with the Global Positioning System (GPS) band due to proposed broadband operations in the L-Band of the electromagnetic spectrum. Specifically, these comments are in response to the final report of the technical working group co-chaired by LightSquared and the United States Global Positioning System (GPS) Industry Council (USGIC) and organized in response to a condition in Federal Communications Commission (FCC) Order and Authorization DA 11-133, dated January 26, 2011.

The NPC represents more than ninety percent of the commercial potato growers in the United States. Potato growers utilize GPS-facilitated precision farming techniques during production to provide consumers around the world with high quality, low cost nutrient dense potatoes and potato products while safeguarding the environment when using pesticides, fertilizers and other crop inputs. GPS assisted technology not only produces significant environmental benefits by using the minimum volume of pesticides possible, but there are also significant economic benefits that accrue to both farmers and consumers. Crop protection tools are not cheap, and use beyond what is absolutely necessary cuts into a grower's bottom line, compromises profitability and increases consumer food costs.

NPC appreciates the extensive work done by the technical working group to test the possible interference of the GPS band by LightSquared's operations in the upper portion of the L-Band, which resides next to the GPS band on the electromagnetic spectrum. The battery of tests that were conducted over a period of three months covered hundreds of possible scenarios and yielded results that "demonstrated potentially significant interference between LightSquared operations in the upper portion of the band and various GPS receivers." Additionally, it was also demonstrated that there were some interference issues in the lower 10 MHz of the band and operations in the upper 10 MHz portion of the band "will adversely affect the performance of a significant number of legacy GPS receivers."

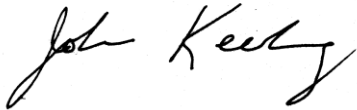
Although LightSquared has indicated its willingness to take specific steps to address the GPS interference issue, NPC has remaining concerns over the implications of an unproven set of

ideas and recommendations which are yet to be successfully implemented and evaluated as a solution to the possible interference issue. NPC also believes that an appropriate technological solution can be found that will allow the co-existence of LightSquared's broadband network and high-precision GPS receivers without interference. This solution should be implemented by LightSquared without adding additional costs to the GPS systems already in use by agriculture.

NPC requests that a technical solution to the interference problem is developed and sufficiently tested prior to being introduced to the marketplace. The failure to do so could result in unintended environmental consequences as well as increased cost of production for potato growers.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "John Keeling". The signature is fluid and cursive, with the first name "John" and last name "Keeling" clearly distinguishable.

John Keeling

Executive Vice President and CEO
National Potato Council